

EXHIBIT 31



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VIA EMAIL

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Carnegie Institution of Washington et al. v. Pure Grown Diamonds, Inc. et al.

Dear Sarah:

I am writing in response to your letter dated May 5. As you know, the COVID-19 pandemic has hit many areas very hard, including the New York City and Singapore areas where the PGD and 2AT Defendants are respectively based. New York has the highest number of cases in the United States—the hardest hit country in the world—and Singapore presently has the most cases in Southeast Asia. As a consequence, both regions have been, and continue to be, under strict lock-down orders. Because both defendants' offices have been closed for some time, and continue to be closed, their abilities to identify and collect responsive documents are limited.

We are continuing to work with our clients to identify whether responsive documents may be available remotely, and we hope to be in a position to provide a more detailed update, as well as a response to your letter dated May 1, in the next several days.

Sincerely,

/s/ J.P. Long

JPL/mrd